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March 18, 2019

By ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **National Lifeline Association Notice of Oral *Ex Parte* Presentation,
WC Docket Nos. 17-287, 11-42 and 09-197**

Dear Ms. Dortch:

On March 14, 2019, during a phone call with Jodie Griffin of the Wireline Competition Bureau (“Bureau”), I underscored the importance of and expressed appreciation for the Commission’s interest in taking appropriate measures to ensure that the National Lifeline Eligibility Verifier (“NLEV”) works for Lifeline eligible low-income consumers and not against them. To this end, I explained that it is the view of the National Lifeline Association (“NaLA”) that the re-verification process being rolled out through the NLEV must incorporate checks or “dips” against the national CMS/Medicaid database, as well as any additional state SNAP databases that may come online, prior to any reenrollments. I also expressed NaLA’s support for NARUC’s recent resolution on maximizing NLEV access to state databases and support for improving the manual re-verification process which at present is not well designed to protect eligible Lifeline households.¹ Finally, I expressed NaLA’s appreciation for recent stakeholder engagement toward implementing a NLEV service provider API solution. I emphasized that such an API will mitigate the NLEV’s functioning as a barrier to program participation by eligible low-income consumers only if it provides carriers with the ability to help consumers navigate the verification process, including through the submission of required documents which can be verified by the consumer.

¹ <https://pubs.naruc.org/pub/75B136DB-CA48-849D-3C81-494773F12613> (last visited Mar. 18, 2019).

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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Counsel to the National Lifeline Association

Enclosure

cc: Jodie Griffin